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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**
10 **AT SEATTLE**

11 Amazon.com Services, LLC,

12 *Petitioner,*

13 v.

14 United States Department of Justice,

15 *Respondent.*
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Case No.

**PETITION TO MODIFY SUBPOENAS
PURSUANT TO 18 U.S.C. § 1968(h)
AND 12 U.S.C. § 1833a(g)(2)**

18 Petitioner Amazon.com Services, LLC (“Amazon”), through its undersigned counsel,
19 submits this Petition pursuant to 18 U.S.C. § 1968(h) and 12 U.S.C. § 1833a(g)(2) for entry of a
20 protective order modifying subpoenas issued by the U.S. Attorney’s Office for the Southern
21 District of New York, a component of Respondent United States Department of Justice, pursuant
22 to the Financial Institutions Reform Recovery and Reinforcement Act, 12 U.S.C. § 1833a.

23 Venue is proper in this District under 18 U.S.C. § 1968(h). The grounds Amazon raises in
24 seeking such relief are articulated in full in Amazon’s Motion for a Protective Order,
25 memorandum of law, and declarations and exhibits attached in support thereof, which Amazon
26 will file contemporaneously with this Petition. Specifically, Amazon seeks modification of the
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PETITION TO MODIFY SUBPOENAS

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subpoenas to establish a schedule for the production of electronically stored information (“ESI”) to allow Amazon sufficient time to review ESI, produce it, log any documents withheld on basis of privilege, and to provide the government sufficient time to review produced documents in advance of depositions of certain relevant custodians, and for other and further relief as the Court deems just and proper. Amazon requests oral argument on this Petition and accompanying motion.

DATED: December 22, 2022

Respectfully submitted,

By: /s/ James E. Howard

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